## Exhibit 3 Declaration of J.L.

## Declaration of J

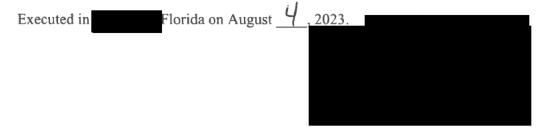
- I, J declare as follows:
  - 1. I, Jacob Lama and a Plaintiff in this case, Farmworker Association of Florida, Inc. et al. v. DeSantis, et al., 1-23-cv-22655-RKA.
  - I make this declaration based on my own personal knowledge. If called as a witness, I would testify competently and truthfully to these matters.
  - 3. I am forty-four years old and a resident of Florida. I am originally from Mexico, and I have never had contact with immigration authorities other than through the submission of a Freedom of Information Act (FOIA) request a few years ago.
  - 4. I am a field coordinator for a nonprofit organization based in Florida. As part of my job duties, I inform workers in my community about health and labor rights. Like me, some of these workers are undocumented immigrants.
  - My outreach and educational efforts in the past few years have focused on COVID-19
    vaccination outreach, labor law protections, and mental health awareness.
  - 6. Our campaigns are important for the health of farmworkers. For example, many farmworkers are unaware of the early symptoms of heat exhaustion, such as cramps and headaches. It's not uncommon for workers in the fields to faint or even die from a heat stroke while working in the sun. We tell them how to avoid a potentially fatal heat stroke, and how to make sure their employers comply with break requirements so that workers are able to take rest in the shade periodically.
  - 7. We also provide important information for workers who interact with dangerous pesticides. We teach them about the appropriate clothing to wear and advise them not to hug their children after work until after showering and changing into clean clothes. The

health consequences of direct exposure to pesticides can be very severe. For example, contact with skin, especially the genital area, can cause infertility and ovarian cancer in women. Taking preventative measures is key. Workers who do not know their rights are at risk of suffering abuses in the workplace. We let workers know about how to file complaints with the Office of Safety and Health Administration (OSHA) when employers put their health and well-being at risk.

- 8. My work as a field coordinator entails travel outside the state of Florida approximately five times per year for trainings, conferences, and workshops dealing with leadership, activism, and workers' rights, among other subjects.
- 9. When traveling by car during trips out of Florida, I often drive passengers, some of whom are immigrants, including undocumented immigrants. Some of these immigrants entered the United States without papers but have since obtained lawful status. Others entered the United States unlawfully and have not had any contact with immigration authorities.
- 10. During these situations, I typically use my personal vehicle to transport people to and from Florida to attend these events. I will also sometimes travel as a passenger in a coworker's vehicle both into and out of Florida.
- 11. For example, in 2020, I drove to a training about COVID-19 vaccination campaigns in Georgia with several undocumented passengers, and then I returned to Florida. In 2021, I drove to a health fair in Georgia. I drove with four passengers who came to help me as volunteers. I believe one or two of them were undocumented, based on their conversations with me.

- 12. I don't know how to arrange for travel outside of the state in a legal way. I want to coordinate with coworkers to be able to join conferences that empower farmworkers, but if I drive I could be prosecuted for a felony if some of my passengers are undocumented.
- 13. On the other hand, if I allow a trusted co-worker to drive, he or she could be prosecuted because of my lack of immigration status. I am also concerned that as I make these travel arrangements, I could be charged with soliciting or conspiring to violate Florida law.
- 14. I am the breadwinner in my household, and my arrest would cause a great financial hardship to me and my family. I don't have funds available to pay for a criminal bond or for a criminal defense attorney. Since my two minor children depend on my income, they would suffer a great hardship if I were arrested.
- 15. The transportation provisions of SB 1718 do not allow me to do my job effectively because I depend on trainings and workshops to be able to provide accurate and up-todate information to the community.

I declare under penalty of perjury that the foregoing is true and correct pursuant to 28 U.S.C. § 1746.



**CERTIFICATION** 

I, Felix A. Montanez, declare that I am proficient in the English and Spanish languages. On August

4, 2023, I reviewed the foregoing declaration with the declarant, J

faithfully and accurately during telephonic communication and email correspondence with the

declarant. After I completed translating and reviewing the declaration with her, the declarant

verified that the contents of the foregoing declaration are true and accurate.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 4, 2023,

Felix A. Montanez